

June 10, 2021

Vanessa A. Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549-1090

RE: Public Input Welcomed on Climate Change Disclosures (March 15, 2021)

Dear Ms. Countryman:

On behalf of Praxis Mutual Funds® and Everence Financial®, I welcome the opportunity to provide this comment letter on the “Public Input Welcomed on Climate Change Disclosures” request for information issued March 15, 2021, and encourage the SEC to establish a mandatory framework for environmental, social and governance (ESG) criteria.

Praxis is the mutual fund family of Everence Financial, a faith-based financial services firm with \$5 billion of assets under management. We serve tens of thousands of shareholders who desire to integrate their values into their investments while planning for their financial future.

Praxis integrates ESG concerns, including climate change, into our investment management. We also practice corporate engagement, using the rights and privileges of our ownership in securities to promote corporate change.

We believe the natural environment is a finite resource, the inheritance of future generations and a gift from God. As stewards of Creation, we expect companies to respect the limits of our natural resources and to work toward environmental sustainability. We also expect companies to act on the basis of shared prosperity, recognizing the value and contributions of all stakeholders in creating and sustaining economic success. On behalf of our clients, we seek a more sustainable and just future for all.

Corporate disclosure of climate and ESG information plays an important role in ensuring transparency and accountability in our capital markets. According to the US SIF Foundation’s 2020 Report on US Sustainable and Impact Investing Trends, \$17 trillion of professionally managed assets in the United States consider environmental, social and governance (ESG) factors. Voluntary ESG disclosures have increased in recent years, which is welcome; however, the information produced is often incomplete, lacks consistency, and is not comparable between companies.

A comprehensive framework for ESG disclosure is needed. Investors need disclosure of the full range of ESG issues that could impact a company, the communities in which it operates, its employees and other stakeholders in order to make informed investment decisions.

Praxis needs quality ESG data both to make informed investment management decisions and to better understand company performance on ESG issues for corporate engagement purposes. As previously stated, many large cap companies voluntarily publish extensive reports that cover ESG issues in lieu of mandatory reporting requirements. However, these reports do not necessarily compare well between companies even within the same industry, and few medium and small companies publish adequate data. Standardized information would be particularly useful.

The SEC should move forward to create a comprehensive, mandatory ESG disclosure framework. Thank you for your consideration.

Sincerely,

Chris Meyer  
Manager of Advocacy and Research  
Praxis Mutual Funds and Everence Financial